

ORIGINAL

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

FREDERICK JACKSON,  
Petitioner,

V.


Case No: 1:CR-00-234-01

UNITED STATES OF AMERICA,  
Respondent,

J. Kane

FILED  
HARRISBURG, PA

DEC 23 2004

MARY E. D'ANDREA, CLERK  
Per 

.....  
MOTION FOR EXTENSION OF TIME

NOW INTO COURT COMES, Frederick Jackson, the petitioner, appearing through Pro-Se representation and respectfully moves this Honorable Court for a 45 Day Extension Of Time to properly and adequately file his response to the government's recommendation to petitioner's motion pursuant to 28 U.S.C. § 2255.

This is a Pro-Se motion and such is to be held to less stringent standards than those drafted by an attorney. HAINES V. KERNER, 30 L. Ed. 2d 652 (1972); CRUZ V. BETO, 31 L. Ed. 2d 263 (1972). UNITED STATES V. GARTH, 188 F. 3d 99 (3rd Cir. 1999)(In light petitioners pro-se status, allegations not unduly conclusory).

In Support Thereof, The Petitioner States As Follows:

**FACTUAL BACKGROUND AND PRIOR PROCEEDINGS**

On August 23, 2000, the petitioner, Mr. Jackson, was indicted for harboring a fugitive in violation of Title 18 U.S.C. § 1071. On January 9, 2001, the petitioner was convicted after a jury trial before this Honorable Court. Petitioner was sentenced to 51 months confinement on July 18, 2001. A notice of appeal was filed on July 23, 2001, and on December 18, 2002, the Third Circuit Court of Appeals affirmed the petitioner's conviction and sentence.

On March 17, 2004, petitioner's motion pursuant to 28 U.S.C. § 2255 was filed in this Honorable Court. On April 26, 2004, petitioner filed his Memorandum Brief in support of his motion pursuant to 28 U.S.C. § 2255, thus amending his initial motion. On April 30, 2004, this Honorable Court granted petitioner's motion to amend and ordered the Honorable Clerk of Court to docket the amended § 2255 motion and to attach petitioner's brief in support of his motion to amend, appropriately.

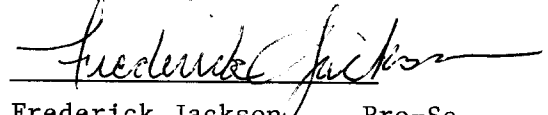
On July 15, 2004, petitioner filed yet, another motion to amend his § 2255 motion and a brief in support of the motion. In support thereof, petitioner's Motion For Extension Time follows:

The Motion Pursuant To 28 U.S.C. § 2255 and the amendment filed in this Honorable Court by Mr. Jackson was researched and prepared by an inmate knowledgeable in the law, since then, Mr. Jackson has been transferred by the Bureau Of Prisons from that institution, leaving behind the legal assistance necessary for Mr. Jackson to properly and adequately file his response to the government's recommendations to his pending motions.

Mr. Jackson has limited education and no knowledge of the criminal procedures. Thus, based on this, Mr. Jackson respectfully request form this Honorable a 45 day extension of time to properly and adequately file his response to the governments recommendations, thus not waiving his right to respond. THOMAS V. ARN, 88, L. Ed. 2d 435 (1985).

WHEREFORE, Mr. Frederick Jackson prays that this Honorable Court grant him the 45 day extension to file his response or an adequate time extension that this Honorable Court might deem proper.

Respectfully Submitted



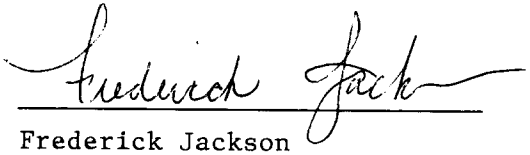
Frederick Jackson Pro-Se  
REG# 53891-004  
Loretto Federal Prison Camp  
P.O. Box 1000  
Loretto, PA 15940

Executed On this 30th Day Of November 2004.

CERTIFICATE OF SERVICE

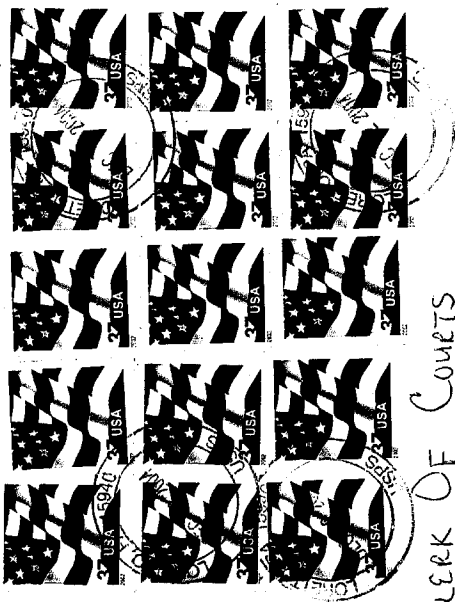
I, Frederick Jackson, hereby certify under the penalty of perjury that on the last date given below, I deposited a true and correct copy of my Motion For Extension Of Time in the Federal Prison's Mail System with the proper First Class affix postage to assure its proper delivery to:

Mr. Eric Pfisterer  
United States Attorney's Office  
UNITED STATES DISTRICT COURT FOR THE  
MIDDLE DISTRICT OF PENNSYLVANIA  
Harrisburg, Pennsylvania 17108- 0805

  
Frederick Jackson

Executed On This 30th Day Of November 2004.

FRED JACKSON 53891-004  
FEDERAL PRISON CAMP LORETTO  
P.O. Box 1000  
LORETTO, PA. 15940



CLERK OF COURTS

UNITED STATES DISTRICT COURT

MIDDLE DISTRICT OF PA.

U.S. Courthouse

228 WALNUT ST.

P.O. Box 983

HARRISBURG, PA. 17108

